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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEIANA GRATE, individually,

Plaintiff,

v.

UNITED STATES OF AMERICA;
XCMNV, LLC d/b/a ACE RENT-A-
CAR, a Domestic Limited-Liability
Company DOE DRIVERS I-V, DOE
OWNERS I-V, ROE EMPLOYER and
ROE COMPANIES,

Defendants.

Case No. 2:24-cv-00459-JAD-NJK

**Stipulated Discovery Plan and Scheduling
Order**

Submitted in Compliance with LR 26-1(b)

Under Federal Rule of Civil Procedure 26(f) and Local Rule 26-1 and per this Court's Order, ECF No. 16, plaintiff Keiana Grate, Defendant United States of America and Defendant XCMNV, LLC d/b/a Ace Rent-A-Car submit their stipulated discovery plan and scheduling order.

Plaintiff filed her Complaint in state court on December 13, 2023, Case No. A-23-883401-C. On March 7, 2024, the United States removed the state court action to this District Court (ECF No. 1) and filed Notice of Substitution of Parties (ECF No. 2) and Motion to Update Case Caption and Docket Sheet (ECF No. 3). On March 8, 2024, Plaintiff and Defendant United States filed a stipulation for extension of time for Defendant to file a Response to the Complaint, which this Court granted on March 11,

2024 (ECF No. 7). On April 5, 2024, Plaintiff filed a First Amended Complaint. On April 8, 2024, Defendant United States filed an Answer to Plaintiff's Amended Complaint. ECF No. 10. On May 10, 2024, Defendant XCMNV, LLC d/b/a Ace Rent-A-Car filed an Answer to Plaintiff's Amended Complaint. ECF No. 15. In accordance with LR 26-1(b)(1), the discovery cut-off date will be 180 days from the date of the first Defendant's Answer. 180 days from April 8, 2024, is October 7, 2024.

The parties met and conferred on June 6, 2024, to discuss matters in compliance with LR 26-1. Based upon counsels' review of the evidence in this case, the parties now propose the following discovery plan:

Deadlines that fall on Saturdays, Sundays, or legal holidays have been adjusted to the next day that is not a Saturday, Sunday, or legal holiday per Federal Rule of Civil Procedure 6(a)(1)(C).

1. Initial Disclosures. The parties will serve initial disclosures by **June 20, 2024**, which is 14 days after Rule 26(f) conference.

2. Close of Discovery. The parties agreed to the 180-day discovery timeline as set forth in Local Rule 26-1(b)(1). Therefore, all discovery must be completed no later than **October 7, 2024**.

3. Amending the Pleadings and Adding Parties. The deadline for filing motions to amend the pleadings or to add parties is **July 9, 2024**, which is 90 days before the close of discovery.

4. Expert Disclosures. Disclosures of experts shall be made 60 days before discovery cut-off date, or by **August 8, 2024**. Disclosure of rebuttal experts shall be made 30 days after the initial disclosures of experts, or by **September 9, 2024**.

5. Dispositive Motions. Dispositive motions must be filed by **November 6, 2024**, which is 30 days after the close of discovery.

6. Pretrial Order. The parties' joint pretrial order is due **December 6, 2024**, which is 30 days after the dispositive-motion deadline. If dispositive motions are filed, the

1 deadline for filing the joint pretrial order will be suspended until 30 days after decision on
2 the dispositive motions or further court order.

3 7. Rule 26(a)(3) Disclosures. The disclosures required by Federal Rule Civil
4 Procedure 26(a)(3) and any objections to them will be included in the parties' joint pretrial
5 order.

6 8. Alternative Dispute Resolution. The parties have considered resolution and
7 the possibility of using alternative dispute-resolution processes, and the parties may revisit
8 these options as the case proceeds.

9 9. Alternative Forms of Case Disposition. The parties have considered trial by a
10 magistrate judge and the short trial program, and the parties may revisit these options as
11 the case proceeds.

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10. Electronic Evidence. The parties anticipate their initial, supplemental, and responsive production of materials will be in .pdf and/or paper formats. These productions may be served by electronic means. The parties understand the United States' productions of electronic files including .pdfs must typically be made via encrypted means, e.g., an encrypted disc, with password provided separately, or use of the United States' cloud-based file exchange portal, "USAfx." Should any technical difficulties arise with these encrypted means, counsel will make good faith efforts to meet, confer, and resolve the difficulties.

Respectfully submitted this 7th day of June 2024.

VAN LAW FIRM

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: June 10, 2024